

REMARKS

In the outstanding Office Action, the Examiner: (i) rejects claims 1, 2, 5, 6 and 13-17 under 35 U.S.C. §103(a) as being anticipated by a Batey et al. article entitled “Dual Orientation Display;” (hereinafter “Batey”); (ii) rejects claims 3, 7 and 10-12 under 35 U.S.C. §103(a) as being unpatentable over Batey in view of U.S. Patent No. 6,832,381 (hereinafter “Mathur”); and (iii) rejects claims 8 and 9 under 35 U.S.C. §103(a) as being unpatentable over Batey in view of Mathur and further in view of U.S. Patent No. 6,163,318 (hereinafter “Fukuda”).

In this response, Applicants: (i) amend claim 9; (ii) add new claim 18; and (iii) traverse the various rejections for at least the following reasons.

Applicants note that Examiner refers to one Batey article, entitled “Dual Orientation Display,” from pp. 814-819. Applicants respectfully point out that there are two Batey articles. The first article is entitled “Dual Orientation Display,” from pp. 814-816, and the second article is entitled “Auto-Reverse Display Feature,” from pp. 817-819. Nonetheless, Applicants will refer to the combination of the two articles hereinbelow as “Batey.”

Regarding the §103 rejection of claims 1, 2, 5, 6 and 13-17, Applicants assert that Batey fails to teach or suggest all of the limitations in claims 1, 2, 5, 6 and 13-17, for at least the reasons presented below.

Claim 1 recites a method for displaying bi-directional text using a browser program on a computer coupled to drive a display and having an operating system such that the computer normally writes text to the display in a default language in a first, default direction, the method comprising: opening a window on the display; receiving a string of codes, each code corresponding to a character in a passage of text, at least a portion of which is in a non-default language that is written in a second direction, opposite to the default direction; and displaying the characters corresponding to the codes in the window such that the passage of text is displayed with all portions thereof arranged in respectively appropriate directions, without reference to language support provided by the operating system or the browser program. Independent claim 13 recites an apparatus-based aspect of the invention having similar limitations.

In an illustrative embodiment of the invention, as depicted in FIG. 1 of the present application, computer 20 is typically not equipped with Hebrew National Language Support (NLS), and keyboard 24 has keys 34, 36, etc., which are imprinted with only Latin characters. If a user of the computer wishes to enter Hebrew text, the user invokes a bi-directional support (BIDI) applet, which opens a window 28 on screen 22 in which an image of a bilingual keyboard 26 is displayed. The applet may be resident on computer 20 or read by the computer from tangible media, such as a diskette, or it may be downloaded from a server, typically associated with a Web site 50 with which computer 20 communicates via the network. The user operates keyboard 26 either by pointing to and clicking on keys 38, 40, etc., using mouse 25, or by depressing the corresponding keys on keyboard 24. Text generated using keyboard 26, as described hereinbelow, is displayed on screen 22 in a text window 44. Preferably, for each text character selected, the applet accesses and displays in the appropriate position in window 44 an image of the character. Such images may be stored and accessed as "GIF" files, for example. Alternatively, the applet uses standard visual fonts (Web fonts), but without the necessity of reconfiguring the browser for this purpose. (See the specification at page 9, lines 5-18).

Applicants respectfully point out that the Examiner does not address the limitation of "displaying the characters corresponding to the codes ... without reference to language support provided by the operating system or the browser program."

Batey discloses a method wherein directional status information is retained when switching from one orientation to the other in a dual orientation display system.

However, Batey does not disclose "displaying the characters corresponding to the codes ... such that the passage of text is displayed with all portions thereof arranged in respectively appropriate directions, without reference to language support provided by the operating system or the browser program," as in the recited claims.

As mentioned in the present specification, at page 2, lines 23-25, aspects of the invention provide for bi-directional entry of text into a computer, without requiring that the computer have the appropriate national language support. Thus, as recited in claims 1 and 13, the characters corresponding to the codes are displayed . . . such that the passage of text is displayed with all

portions thereof arranged in respectively appropriate directions, without reference to language support provided by the operating system or the browser program. Batey does not expressly or impliedly disclose such a feature. Applicants suggest that this is because there is no suggestion in Batey that its dual orientation display and auto-reverse display feature are operable without language support provided by the operating system (which controls the computer system that drives the visual display unit of Batey) or a browser program. In fact, browser programs were not even known in 1979 when Batey was published.

Furthermore, Applicants respectfully point out that the present Office Action does not appear to even address this limitation in the claims.

For at least the above reasons, Applicants assert that claims 1 and 13 are patentable over Batey. In addition, Applicants assert that claims 2, 5, 6 and 14-17 are patentable over Batey not only due to their respective dependence on claims 1 and 13, but also because such dependent claims recite patentable subject matter in their own right.

Regarding the §103 rejection of claims 3, 7 and 10-12 based on the combination of Batey and Mathur, Applicants assert that the combination fails to disclose all of the limitations of said claims.

Claim 3 recites displaying a keyboard in the non-default language on the computer display and receiving an input from the user responsive to the displayed keyboard. The Office Action cites column 11, lines 1-35 of Mathur in rejecting the claimed feature. However, as clearly explained at the cited portion of Mathur, Mathur is describing a touch screen-based handwriting recognition engine, wherein a user uses a stylus to enter “ink” strokes representative of characters. However, nowhere does Mathur (and thus the combination) disclose that “a keyboard in the non-default language is displayed on the computer display,” as recited in claim 3. The use of a touch-screen-based handwriting recognition engine would preclude the use of a displayed keyboard in the non-default language. In fact, at column 11, lines 11-13, Mathur states, with emphasis supplied, that “the handwriting recognition component is particularly useful in embedded systems that have a touch sensitive display, but no keyboard.”

Claim 7 recites reading codes of characters located in an area of the display overlaid by the window. The Office Action cites column 6, lines 45-67, of Fukuda (not Mathur) in rejecting the

claimed feature. Nonetheless, it is completely unclear what Fukuda's discussion of overlapped or non-overlapped window graphs has to do with the claimed feature of reading codes of characters located in an area of the display overlaid by the window. Thus, the combination is deficient.

Claims 10-12 recite, respectively, translating the codes of the characters on the display so that they appear in the window in an alphabet of the non-default language (claim 10), wherein translating the codes of the characters comprises reversing an order of the converted characters so that they appear in their correct order in the non-default language (claim 11), and wherein reversing the order of the characters comprises reversing an order of at least some of the characters in the window responsive to an order switch invoked by a user of the computer (claim 12). The Office Action, at page 6, states without explanation that these claims are rejected under similar rationale for rejecting claims 3 and 7. However, it is completely unclear where any support may be found in Batey/Mathur/Fukuda combination for the claimed features.

Regarding the §103 rejection of claims 8 and 9 based on the combination of Batey, Mathur, and Fukuda, Applicants assert that the combination fails to disclose all of the limitations of said claims.

Claims 8 and 9 respectively recite opening the window comprises adjusting coordinates of the window so as to contain characters on the display corresponding to the string (claim 8), and receiving the string of codes comprises cutting and pasting characters on the display corresponding to the string so as to be contained the window (claim 9).

The Office Action cites column 5, lines 1-17, of Fukuda in rejecting these claimed features. However, this portion of Fukuda discusses adjusting "depths" associated with windows so as to avoid overlapping. Again, it is completely unclear how Fukuda (and thus, the cited combination) teaches these claimed features.

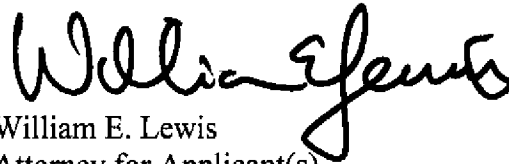
Applicants also assert that any combination of Batey with Mathur and/or Fukuda is improper since the Examiner has not established legally sufficient motivation for combining the references. In addition, the references are not combinable since they provide different solutions to different problems in different technical areas.

New claim 18 recites permitting a user to selectively manipulate the passage of text or the

window so that the passage of text is contained within the window. Support for the claim can be found in the specification at page 5, lines 11-15. For example, receiving the string of codes includes reading codes of characters located in an area of the display overlain by the window, wherein opening the window includes adjusting coordinates of the window so as to contain characters on the display corresponding to the string. Alternatively, receiving the string of codes includes cutting and pasting characters on the display corresponding to the string so as to be contained within the window. To the degree that the Examiner would suggest that such new claim is unpatentable over the Batey/Mathur/Fukuda combination, Applicants direct the Examiner to the above arguments pertaining to claims 8 and 9.

In view of the above, Applicants believe that claims 1-18 are in condition for allowance, and respectfully request withdrawal of the §103(a) rejections.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William E. Lewis". The signature is fluid and cursive, with the first name "William" being the most prominent part.

William E. Lewis  
Attorney for Applicant(s)  
Reg. No. 39,274  
Ryan, Mason & Lewis, LLP  
90 Forest Avenue  
Locust Valley, NY 11560  
(516) 759-2946

Date: October 25, 2006